

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

MELISSA McFADDEN,	:	CIVIL ACTION NO. 18cv544
	:	
Plaintiff,	:	
	:	JUDGE SARGUS
v.	:	
	:	MAGISTRATE JUDGE JOLSON
	:	
CITY OF COLUMBUS,	:	
	:	
Defendant	:	

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**JOINT MOTION REQUESTING A STATUS CONFERENCE**

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The Parties respectfully request a Status Conference before the Honorable Magistrate Judge Jolson to provide the Court a progress report on discovery, and discuss potential new deadlines for discovery to meet the Parties' needs and allow for effective prosecution and defense of the case. The Parties are available on January 7, or 8, for a telephonic Status Conference. A Memorandum in Support is attached to this Motion.

Respectfully submitted:

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**MEMORANDUM IN SUPPORT**

Since this action was instituted Plaintiff has served substantial paper discovery requests to Defendant. Plaintiff's requests encompass both interrogatories as well as requests for production documents. Defendant has determined that in order to respond to Plaintiff's requests that there are thousands, of documents that are responsive. Prior to production of these e-mails, Defendant must review each document not only for traditional privileges, but also for privileges unique to law enforcement agencies to ensure that the production of documents do not interfere with the Division of Police's crime interdiction responsibilities. Because of the volume of documents responsive to Plaintiff's requests, and the review necessary prior to production, the discovery process has been slowed beyond the Parties' initial estimates.

Moreover, adding to the delay, was an unforeseen promotion of Defendant's lead counsel, requiring the substitution of Mr. Phillips. Mr. Phillips is working diligently to understand the case and respond to discovery.

Therefore, based on these unforeseen delays, the Parties respectfully request a telephonic Status Conference to be held at the Court's convenience on January 7, or 8, to provide an update as to the production of documents, as well as to suggest a case calendar that fits the Parties' needs in the matter.

Respectfully submitted:

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 19<sup>th</sup> day of December, 2019, this document was electronically filed via the Court's authorized electronic filing system to all parties involved.

By: */s/ Samuel M. Schlein*  
Samuel M. Schlein (0092194)